



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

via e-mail

February 13, 2020
FPU20-179

Ms. Catherine Jerrard
AFCEC/CIBW
706 Hangar Road
Rome, NY 13441

RE: WAFB – ADEQ Evaluation – *Final, Soil Vapor Extraction System Operation and Maintenance, 2016 Annual Performance Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center [AFCEC/CIBW], Lackland AFB, TX; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec), Phoenix, AZ; document dated January 22, 2019.

Dear Ms. Jerrard:

Arizona Department of Environmental Quality (ADEQ) Federal Projects Unit (FPU) and ADEQ contractor UXO Pro, Inc. reviewed the documents and correspondence referenced above and below. This letter provides ADEQ's evaluation of the responses to ADEQ comments, and as appropriate, ADEQ's evaluation of correspondingly revised documents. Below is a list of prior documents and correspondence associated by direct reference or inference.

- ADEQ Correspondence FPU19-055; dated September 19, 2018; sent to Ms. Catherine Jerrard, AFCEC/CIBW, Rome, NY; sent by Wayne Miller, ADEQ Project Manager.
RE: WAFB – ADEQ Comments – *Draft, Soil Vapor Extraction System, Operation and Maintenance, 2016 Annual Performance Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center (AFCEC/CIBW), Lackland AFB, TX; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec), Phoenix, AZ; document dated July 23, 2018.
- *Draft, Soil Vapor Extraction System, Operation and Maintenance, 2016 Annual Performance Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center (AFCEC/CIBW), Lackland AFB, TX; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec), Phoenix, AZ; document dated July 23, 2018.

ADEQ's evaluation follows.

Main Office

1110 W. Washington Street • Phoenix, AZ 85007
(602) 771-2300

Southern Regional Office

400 W. Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

www.azdeq.gov

printed on recycled paper

Evaluation

- (1) ADEQ acknowledges the majority of responses to the ADEQ September 19, 2018 comments (FPU19-055) are generally acceptable.
- (2) ADEQ is of the opinion that the 2-volume annual report contains information and topics which may have been better served as stand-alone, independent documents.
- (3) ADEQ acknowledges that ADEQ's evaluation is significantly delayed, in part by the comment quantity and topic quantity, and also in part by an ADEQ-internal audit process conducted during 2019.
- (4) ADEQ's evaluation noted that some additional clarification could benefit report users.

Additional Clarification Requests:

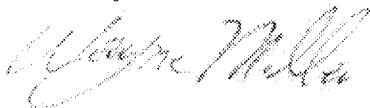
1. Refer to FPU19-055; General Comment 3 (*Appendix A Draft Additional Site Characterization Drilling Completion Report...information...“Included on CD Only”...may create...access and review issues.*) AND Specific Comment 21 (*Appendix A Additional Site Characterization Report*). Please verify documents completeness. Attachment D of Appendix A may not be included in all report versions released. The response to ADEQ's comment indicates Attachment D was included as a separate file. However, Attachment D was not available on at least one copy received by ADEQ and UXO Pro, Inc. While the AFCEC Administrative File does appear to have Attachment D (reference AR #582998.5 and 582998.6), the Administrative File copy appears incomplete. The Administrative File appears to lack the analytical laboratory reports for soil samples SB18-205' and LSZ53-147' and -169'.

Closure

ADEQ may add or amend comments, evaluations, and concurrence if evidence to the contrary of our understanding is discovered; if received information is determined to be inaccurate; if any condition was unknown to ADEQ at the time this document was delivered; if other parties bring valid concerns to our attention; or site conditions are deemed not protective of human health and the environment within the scope of this Department.

Thank you for the opportunity to comment. Should you have any questions regarding this correspondence, please contact me by phone at (602) 771-4121 or e-mail miller.wayne@azdeq.gov.

Sincerely,



Wayne Miller
ADEQ Project Manager, Federal Projects Unit
Remedial Projects Section, Waste Programs Division

cc:

Catherine Jerrard, USAF AFCEC/CIBW
Carolyn d'Almeida, U.S. EPA
William Hughes, CNSP
Steve Willis, UXO Pro, Inc.
ADEQ Reading and Project File

catherine.jerrard@us.af.mil
dAlmeida.Carolyn@epamail.epa.gov
William.Hughes@cn-bus.com
steve@uxopro.com